Region 4 U.S. Environmental Protection Agency Science and Ecosystem Support Division Athens, Georgia

OPERATING PROCEDURE

| Title: Training | | | | | |
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Revision History

This table shows changes to this controlled document over time. The most recent version is presented in the top row of the table. Previous versions of the document are maintained by the SESD Field Quality Manager.

| History | Effective Date | |
|---|------------------|--|
| SESDPROC-007-R2, <i>Training</i> , replaces SESDPROC-007-R1 | November 1, 2007 | |
| General Revised form names for consistency with the actual form name. | | |
| Table 1 Added Testimony Training to the table. | | |
| Section 1.5 Alphabetized. Revised the referencing style for consistency. | | |
| Section 2.4 Added "proficiency testing" to the second sentence. | | |
| SESDPROC-007-R1, <i>Training</i> , replaces SESDPROC-007-R0 | October 8, 2007 | |
| General Changed title for Antonio Quinones on cover page from Environmental Investigations Branch to Enforcement and Investigations Branch. | | |
| Due to extensive revisions by Danny France, author was changed from Kevin Simmons to Danny France. | | |
| Section 1.1 Editorial changes. | | |
| Section 1.2 Changed to reflect that the procedure addressed the training requirements of ISO 17025. | | |
| Section 1.3 Changed from Definitions to Documentation /Verification. All text was added. | | |
| Section 1.4 Changed from References to Definitions. All text | | |

was incorporated from previous Section 1.3.

Section 1.5

Added to incorporate references from previous Section 1.4. Deleted references to HRO-P-5, HRO Training Policy, EPA Order 3151.1 and added reference to EPA Form SR182.

Section 2.1

Changed title from Summary to General. Editorial changes to first paragraph. Moved forth and fifth sentences of second paragraph to Section 2.6. Moved third paragraph and bulleted list to Section 2.5. Deleted third, fifth and sixth sentences of forth paragraph.

Section 2.2

Changed title from New Employee Orientation to Employee Qualifications. Text was incorporated from second and third paragraphs of Section 2.7.

Section 2.3

Changed title from Personnel Training Responsibilities to New Employee Training. Incorporated text form former Section 2.2. Deleted last two sentences of former Section 2.2 and added text to reflect that Section Chief retains New Employee Training Checklist until all training has been completed and then checklist if forwarded to FQM.

Section 2.4

Changed title from Training Plan Development to Personnel Training Responsibilities. Incorporated information from previous Section 2.3. Revised first sentence by removing references to EPA training documents. Reorganized remaining information.

Section 2.5

Changed title from Training Effectiveness Evaluation to Training Plan Development. Incorporated information from previous Section 2.4 and expanded information. Removed reference to EPA Individual Development Plan. Added text about Individual Training Plan and the associated form. Added Table 1 and discussion of core training requirements.

Section 2.6

Changed name from Evaluation of Competency/Proficiency to Training Effectiveness Evaluation. Deleted all information in previous Section 2.6. Incorporated information from

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| previous Section 2.5. Added second paragraph. | |
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| Section 2.7 Moved information from second and third paragraphs to Section 2.2. Deleted third paragraph. | |
| SESDPROC-007-R0, <i>Training</i> , Original Issue | February 5, 2007 |

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Contents

1 General Information

1.1 Purpose

The purpose of this procedure is to outline the overall training program for EPA personnel subject to the SESD Field Branches Quality System. The training program will provide a plan for retention and enhancement of employee knowledge, skills, and abilities in performing work activities.

1.2 Scope

This procedure addresses the training requirements for EPA as required by ISO 17025.

1.3 Documentation/Verification

This procedure was prepared by persons deemed technically competent by SESD management, based on their knowledge, skills and abilities. The official copy of this procedure resides on the H: drive of the SESD local area network. The Field Quality Manager (FQM) is responsible for ensuring the most recent version of the procedure is placed on the H: drive and for maintaining records of review conducted prior to its issuance.

1.4 Definitions

1.4.1 Competency Evaluation

Competency Evaluation is an initial evaluation of a field investigator or laboratory analyst to determine if they have demonstrated the necessary skills and knowledge to independently perform measurement or sampling activities. Upon demonstration of competency for a measurement or sampling procedure, a field investigator or laboratory analyst is deemed proficient in that procedure for a period of four years.

1.4.2 Mandatory Training

Training required by law or agency directives; training needed to maintain specific certifications.

1.4.3 On-The-Job Training

On-the-job describes training that is given in a normal working situation, typically conducted by one employee for another, using the actual tools, equipment, documents or materials that they will use when fully trained.

1.4.4 Proficiency Testing

A systematic approach in which field and laboratory measurements are demonstrated to be accurate by the analysis of materials of known composition. For sampling activities, proficiency is evaluated by direct observation by a qualified operator to ensure that procedures are conducted as defined in a procedure by a field investigator.

1.4.5 Developmental Training

Training that leads to enhancing knowledge, skills, and abilities.

1.4.6 Required Training

Training identified by management as needed in order for employees to be competent to perform current or future assignments.

1.5 References

EPA Order 3500.1 Training and Development for Compliance Inspectors/Field Investigators.

EPA SF-182, Request, Authorization, Agreement and Certification of Training Form, most recent version

Field Branches New Employee Training Checklist, SESDFORM-007, Most Recent Version

Individual Training Plan, SESDFORM-023, Most Recent Version

SESD On-the-Job Training (OJT) Form, SESDFORM-002, Most Recent Version

SESD Operating Procedure for Competency and Proficiency Testing, SESDPROC-006, Most Recent Version

SESD Operating Procedure for Management Review, SESDPROC-013, Most Recent Version

Training Evaluation Form, SESDFORM-024, Most Recent Version

Training Certification Form, SESDFORM-013, Most Recent Version

2 SESD Field Branches Training Program

2.1 General

This procedure describes the SESD field branches training program. The objectives of the program are to provide field investigators and laboratory analysts with the necessary knowledge, skills, and abilities to perform work activities and to meet agreed upon customer requirements.

The training program employs a mechanism for identifying training needs, for providing training opportunities, and for evaluating and documenting the training received. EPA management is responsible for fostering an atmosphere wherein employees are encouraged to improve their knowledge, to grow professionally, and to further develop their potential. EPA management is also responsible for providing training opportunities and for evaluating and documenting the training received.

EPA management and staff will be provided training needed for full participation in the operation of the SESD Field Branches Quality System.

Training is categorized as mandatory, required, or developmental. The training may be in the form of on the job training, formal SESD training classes or training classes from outside sources such as contractors, instrument manufacturers, or universities, and may include technical conferences. Management will determine the priority of specific training within available funding and assure that funded training is conducted and documented.

Training may be documented with certificates of completion issued by the training provider, the SESD On-the-Job Training (OJT) Form (SESDFORM-002), the Training Certification Form (SESDFORM-013), or the EPA SF-182, Request, Authorization, Agreement and Certification of Training Form. Documentation and records of training specific to performance of the SESD field quality system procedures will be maintained by the FQM. Additional training records will be maintained by the appropriate personnel, as designated by SESD management.

2.2 Employee Qualifications

EPA operates its' hiring procedures under the federal government's Office of Personnel Management (OPM) regulations. OPM issues qualification and classification standards for all general schedule (GS) positions. (http://www.opm.gov/qualifications/index.asp). The OPM qualification and classification standards describe the educational and experience requirements which a potential employee must meet to satisfy the OPM requirements for a specific job series and grade. Before an employee is hired, OPM verifies that the applicant meets the education and experience requirements for the appropriate GS series and grade.

After the verification process is complete, managers are authorized to hire an applicant who meets the OPM requirements from a certificate of eligible candidates.

NOTE: EPA's Office of Personnel Management (OPM) maintains all records pertinent to an employees educational and experience qualifications for hiring.

2.3 New Employee Training

All new employees are required to take training identified by management prior to performing work activities. This training will include a briefing on the SESD Quality System; Ethics; Computer Security; Facility Security; and the SESD Safety, Health, and Environmental Management Program. For employees issued credentials, management will ensure the training requirements of EPA Order 3500.1 are satisfied. Management can select other topics as needed. The training is provided by the organizational unit that has functional responsibility for the topic. The New Employee Training Checklist (SESDFORM-007) will be used to document the training. The checklist is retained by the employee's Section Chief until all training has been completed. The checklist is then forwarded to the FQM. Management will implement individual training requirements for each new employee by ensuring training is provided, documented, and records are maintained indicating completion.

2.4 Personnel Training Responsibilities

Management has the primary responsibility for determining the appropriate employee training needs. Managers must also know and plan for individual employee mandatory training, e.g., safety, health, ethics, proficiency testing, or other training required periodically. Finally, management must determine the best way to obtain the needed training within the funding that is available.

In the event project specific training is required, the Section Chief will work in conjunction with the project leader to identify the type of training required and to ensure all project personnel are properly trained.

2.5 Training Plan Development

The Section Chiefs within the SESD field branches work with each employee to identify training needs associated with the three types of training: mandatory, required and developmental. After identifying training needs, a training plan is devised to address the needs. At least twice each year, managers meet with employees to discuss training needs and jointly complete the Individual Training Plan (SESDFORM-023). This plan reflects and addresses all program-specific and/or extracurricular training. Identification of training needs is a joint effort between management and each individual. The Section Chiefs evaluate training requests to ensure the training is relevant to the present and future tasks of the Division.

Particular attention is given to the selection and training for:

- 1. New employees to help them achieve competency to perform SESD field sampling and field measurement procedures
- 2. Preparation of personnel to complete current assignments
- 3. Preparation of personnel for new assignments
- 4. Significant procedural change
- 5. Process/technology change
- 6. Addressing nonconformance to the quality system
- 7. Personnel who are issued EPA inspection credentials under EPA order 3500.1

The training listed in Table 1 may be mandatory for certain field and laboratory personnel depending on their job duties. This is not a comprehensive list but rather the core of the training required for most field and laboratory personnel.

Table 1: Core Training Requirements for Field and Laboratory Personnel

| Title of Training | Personnel | When Required | Person(s) Responsible |
|---|----------------------------------|---|--------------------------------|
| Hazardous Waste Operations and Emergency Response Standard (HAZWOPER) / 40- Hour | Field | For all permanent employees who will be working at superfund sites before they begin field work | EIB and EAB Safety Officers |
| Hazardous Waste Operations and Emergency Response Standard (HAZWOPER) / 8- hour refresher | Field | Yearly refresher required for those who are working on superfund sites | EIB and EAB Safety Officers |
| Laboratory Safety Training | Laboratory | For all permanent employees who will be working in the laboratories | EIB and EAB Safety Officers |
| Laboratory Safety Training Refresher | Laboratory | Yearly | EIB and EAB Safety Officers |
| Fire extinguisher training | Field and Laboratory | Yearly | EIB and EAB Safety Officers |
| CPR | Field and Laboratory | Yearly | EIB and EAB Safety Officers |
| First Aid | Field and Laboratory | Every Three Years | EIB and EAB Safety Officers |
| Basic Inspector Training | EPA Credentialed Employees | Prior to leading an EPA Inspection* | Management |
| Program Specific Training (Water, RCRA, Air)** | EPA Credentialed Employees | Prior to leading an EPA Inspection* | Management |
| Program Specific OJT | EPA Credentialed Employees | Prior to leading an EPA Inspection* | Management |
| Testimony Training | Field, as appropriate | Every three to four years | Management |

^{*} EPA Order 3500.1 specifies that the supervisor will determine when a trainee has met the 3 basic training requirements prior to leading an EPA inspection.

^{**} Program specific training can include SESD sponsored Inspector Training such as the NPDES Inspection Workshop, Hazardous Waste Site Sampling, etc.

2.6 Training Effectiveness Evaluation

During the annual Management Review of the SESD Quality System, the FQM and management will evaluate the effectiveness of the field branches training program. The FQM maintains records of proficiency testing results, internal audits, and external assessments as a means of measuring the effectiveness of the training that was provided to field and laboratory personnel.

Field investigators and laboratory analysts are also required to complete the Training Evaluation Form (SESDFORM-024) or the EPA SF-182, Request, Authorization, Agreement and Certification of Training Form to assess the effectiveness of any training received. Additional training needs may be identified as a result of the evaluation. The Section Chiefs will maintain all training evaluation records.

2.7 Training Records

The FQM will maintain all documentation of quality system training for EPA and ESAT contract field and laboratory personnel subject to the requirements of ISO 17025. The records will include:

- 1. Field Branches New Employee Training Checklist (for new employees after the Year 2006)
- 2. Sampling and measurement authorizations from management
- 3. Academic qualifications
- 4. Confirmation of training taken (Certificates or Form)
- 5. Summary of proficiency tests and competency evaluations, as appropriate
- 6. Position descriptions

Records will be sufficiently detailed to show that personnel were qualified for hiring, that they have been trained, that their ability to conduct work has been formally evaluated, and that they have been authorized to conduct work, either with assistance or independently.